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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,)	
)	Case No: 17-cv-02000-APG-GWF
Plaintiff,)	
)	
v.)	DECLARATION OF COUNSEL
)	REGARDING EMERGENCY JOINT
REVMOUNTAIN, LLC, <i>et al.</i> ,)	MOTION OF PLAINTIFF FTC AND
)	DEFENDANT DANIELLE FOSS TO
Defendants.)	ENTER STIPULATED ORDER TO
)	RELEASE FUNDS

23 Pursuant to Local Rule 7-4(a), Plaintiff Federal Trade Commission ("FTC") submits this
24 declaration of counsel in support of the Emergency Joint Motion of Plaintiff FTC and
25 Defendant Danielle Foss to Enter Stipulated Order to Release Funds.

26 (1) The FTC and Defendant Foss file this motion as an emergency motion following the
27 direction of the Court at the preliminary injunction hearing on August 29, 2017, that motions to
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1 release funds for living expenses should be filed as emergency motions. The FTC and
2 Defendant Foss further state that release of funds for living expenses is an urgent matter for the
3 Court's consideration.

4 (2) The movants and affected parties are Plaintiff FTC and Defendant Danielle Foss.
5 The FTC's office address and counsel's telephone numbers are: Sarah Waldrop and Michelle
6 Schaefer, 600 Pennsylvania Ave. NW, Mailstop CC-9528, Washington, DC 20580, 202-326-
7 3444 (Waldrop), 202-326-3515 (Schaefer). Defendant' Foss's counsel's office address and
8 telephone number are: Rachel Hirsch, Ifrah Law PLLC, 1717 Pennsylvania Ave. NW, Suite
9 650, Washington, DC 20006, 202-524-4145.

10 (3) The joint movants have no dispute regarding entry of the attached stipulated order.
11 The movants did not contact other parties to this matter regarding this joint motion because the
12 attached stipulated order concerns and affects only Defendant Foss.

13 Respectfully submitted this 5th day of September, 2017.

14 /s/ SARAH WALDROP
15 SARAH WALDROP
16 MICHELLE SCHAEFER
Attorneys for Federal Trade Commission
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